

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**GEORGIA STATE CONFERENCE OF )  
NAACP, ET AL. )**

**PLAINTIFFS, )**

**V. )**

**STATE OF GEORGIA, ET AL. )**

**DEFENDANTS. )**

**CIVIL ACTION NO.  
1:21-CV-5338-  
ELB-SCJ-SDG**

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**COMMON CAUSE, et al., )**

**PLAINTIFFS, )**

**V. )**

**BRAD RAFFENSPERGER, )**

**DEFENDANT. )**

**CIVIL ACTION FILE NO.  
1:22-CV-00090-  
ELB-SCJ-SDG**

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**MOTION FOR PROTECTIVE ORDER  
AS TO NON-PARTY SUBPOENAS**

COME NOW, John Kennedy, Bonnie Rich, the “Senate Reapportionment and Redistricting Committee,” the “House Reapportionment and Redistricting Committee,” Gina Wright, Executive Director of the Legislative and Congressional Reapportionment Office, and the Legislative and Congressional Reapportionment Office (collectively the “Movants”) and file this, their Motion for Protective Order as to the documents and testimony sought in the Subpoenas issued to Movants by

the Plaintiffs, attached hereto as Exhibits A-L and incorporated herein by this reference on the grounds that that evidence and testimony sought in the subpoenas are barred by the doctrine of legislative privilege.

In support of this Motion, Movants rely on their Brief in Support of Motion for Protective Order filed contemporaneously herewith.

WHEREFORE, Movants pray that this Court enter an Order consistent with Movants' proposal as enumerated in their accompanying Brief.

Respectfully Submitted, this 9<sup>th</sup> day of September, 2022.

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**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with LR 5.1(A), (N. D. Ga.), I have this date electronically filed the within and foregoing **MOTION FOR PROTECTIVE ORDER AS TO NON-PARTY SUBPOENAS** in the above-styled action with the Clerk of Court by using the Court's CM/ECF system, which will automatically send notice of same to the following:

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I further certify that the within and foregoing has been prepared in accordance with Local Rule 5.1(C) and is in a 14-point Times New Roman font.

This 9<sup>th</sup> day of September, 2022.

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